

AUSTRALIAN TELECOMMUNICATIONS ALLIANCE SUBMISSION

To: The Australian Communications and Media Authority
Re: Compliance Priorities 2026-2027

19 March 2026



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1. AUSTRALIAN TELECOMMUNICATIONS ALLIANCE

The Australian Telecommunications Alliance (ATA) is the peak body of the Australian telecommunications industry. We are the trusted voice at the intersection of industry, government, regulators, and consumers. Through collaboration and leadership, we shape initiatives that grow the Australian telecommunications industry, enhance connectivity for all Australians, and foster the highest standards of business behaviour. For more details, visit www.austelco.org.au.

For questions on this submission, please contact Peppi Wilson, p.wilson@austelco.org.au.

2. INTRODUCTION

- 2.1 The ATA appreciates the opportunity to provide input into the ACMA's compliance priority work program planning for 2026-27.
- 2.2 Overall, we support both the ACMA's proposal to continue to focus on the 2025-26 compliance and enforcement areas, and its proposed focus on areas of matters of public safety and community safeguards.
- 2.3 We also support the Australian Communications and Media Authority adopting a proportional and graduated approach when responding to compliance and enforcement matters, consistent with its [Compliance and Enforcement Policy](#). This should involve a constructive, educational, and risk-based supervisory assurance approach where appropriate—particularly in relation to new, strengthened, or operationally complex requirements—while allowing for escalation to more punitive measures in cases involving systemic issues or repeated instances of material harm.
- 2.4 Where appropriate, the ATA would welcome the opportunity to provide input and feedback on the ACMA's educational activities, which can serve both to educate and to clarify the scope and application of the law. For example, we support the approach taken in producing guidance on the implementation of the new domestic, family and sexual violence standard and appreciate the ACMA's commitment to further updates to that guidance as more questions arise.
- 2.5 In addition to being helpful for industry players of all sizes and profiles, the ATA suggests that this kind of proportional, constructive and graduated approach leads to better consumer outcomes overall, and aligns with the government's ambitions to support diverse, competitive and effective markets.

3. CURRENT AND CONTINUING ACMA PRIORITY AREAS

The order of our comments below reflects the ACMA consultation paper; it is not an indication of priority.

3.1 DODGY DEVICES

3.1.1 The ATA supports the ACMA's focus on tackling the supply of non-compliant and illegal radio communications devices advertised and bought online; these devices are a threat to public safety, and we support ACMA's work both to sign up more retailers to the pledge and to educate consumers about the harms such devices cause.

3.2 IDENTITY SECURITY, SCAMS, VULNERABLE CONSUMERS

3.2.1 We support the ACMA continuing to focus on compliance with existing mandatory telco regulation designed to protect consumers from mobile number fraud and scams, and extending its enduring priorities.

3.2.2 We also support the ACMA's focus on compliance with regulations designed to protect and assist vulnerable consumers, including the new Domestic, Family and Sexual Violence Standard.

3.2.3 However, we urge the ACMA to recognise the tensions between different regulations in a complicated operating environment in its enforcement and compliance response. This includes recognising the potential for what may later be judged to be the wrong decision to be made for the right reasons. Or the potential for disagreement on what is the 'right' decision. And for telcos, the TIO or even the ACMA to be placed in a position where they are asked to make decisions or even act as an arbitrator between two consumers on one account, without full visibility of the facts (a particular concern for domestic and family violence issues).

3.2.4 We anticipate that such tensions will increase further with the introduction of the Scam Prevention Framework.

3.2.5 The ATA therefore encourages and supports:

- (a) ongoing dialogue between the ACMA, TIO and industry to help identify how and why such errors or difficulties occur, consulting with other parties where required, and to agree on safe, reasonable approaches to managing different scenarios.
- (b) the ACMA taking the lead on using this work to inform and educate industry, consumers and other stakeholders as required, with a view to encouraging a more open and constructive environment where uncertainties and concerns can be admitted and worked through, with all parties working together towards increased compliance better outcomes over time.

3.2.6 The ATA would be pleased to assist and participate in these activities, as appropriate.

3.3 TRIPLE ZERO AND PUBLIC SAFETY

- 3.3.1 The ATA supports the ACMA's continued focus on compliance with new obligations on Triple Zero and unplanned outages.
- 3.3.2 In line with its compliance and enforcement policy and in line with our comments about the compliance approach for other new regulations, we would like to see the ACMA's focus being on practical guidance, targeted monitoring and escalation for repeated systemic failures that undermine emergency calling or public safety outcomes.
- 3.3.3 Recognising the importance of device compliance in maintaining emergency calling integrity, we would also welcome the ACMA conducting a targeted supplier assurance program / audits against the Telecommunications Labelling Notice and relevant standards (incl. AS/CA S042.1:2025).
- 3.3.4 We also suggest risk-based market surveillance of higher-risk device cohorts, and clear supplier guidance on evidence expectations.

3.4 REGULATORY CLARITY

- 3.4.1 When considering its compliance activities, the ATA urges the ACMA to reflect on the intended outcome of the regulation and to target its compliance activities accordingly. This will help to ensure that its compliance response is proportionate, effective, directed at actual risk or harm and does not extend beyond the activities or risk profiles that the regulation is designed to regulate or create unnecessary red tape or regulatory burden.
- 3.4.2 The ATA also supports the ACMA producing more guidance on compliance, both with individual instruments (as it is doing for DFSV), but also extending to provide an overview or map of the different obligations with which telcos must comply (telco-specific and major economy-wide obligations). This would assist in identifying intersection and overlap between, for example, rules and regulations managed and enforced by the ACMA, and those managed by Treasury, the ACCC or various jurisdictional-level regulators. In addition to helping smaller players and new market entrants to understand (and therefore comply with) the complicated regulatory environment, such information could be used to help achieve the government's stated aim of reducing regulatory burden.
- 3.4.3 More specific areas for regulatory clarity include:
 - (a) advice about the intersection of the obligations under the Financial Hardship Standard and other regulatory instruments.
 - (b) advice about the intersection of the obligations under the DFSV Standard and other regulatory instruments, as already mentioned.

3.5 FUTURE AREAS OF FOCUS

- 3.5.1 To support the industry's focus on emergency calling integrity and the device compliance work noted at 3.3.3, the ATA is keen to work with the ACMA to explore in detail the idea of establishing a national mobile device compliance register. The objective is to consider whether such a register

might assist with identified device compliance and suitability issues which are particularly important in strengthening confidence of device emergency calling capability at initial supply and supporting enforcement, policy development and technology transition planning.

- 3.5.2 Should such a register be established, it may be a future candidate for educational activity or compliance activities, depending on the model agreed.

Ends

